

COMMONWEALTH OF KENTUCKY  
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

PETITION OF VIRGIN MOBILE USA, L.P. FOR	)	CASE NO.
LIMITED DESIGNATION AS AN ELIGIBLE	)	2010-00524
TELECOMMUNICATIONS CARRIER	)	

O R D E R

On December 29, 2010, Virgin Mobile USA, L.P. ("Virgin Mobile"), a Commercial Mobile Radio Service provider, filed a petition under 47 U.S.C. § 214(e)(2) seeking designation as an Eligible Telecommunications Carrier ("ETC") to receive federal universal service support in Kentucky.<sup>1</sup> Virgin Mobile seeks ETC designation only for the purpose of participation in the Lifeline Program. Virgin Mobile does not seek high-cost support.

The petition states that: (1) Virgin Mobile meets all the requirements for designation as an ETC to serve the designated areas in the state of Kentucky;<sup>2</sup> (2) Virgin Mobile requests designation throughout each of the designated areas within its service coverage;<sup>3</sup> (3) in accordance with 47 U.S.C. § 214(e)(2), Virgin Mobile seeks to be designated as an ETC in rural and non-rural wirecenters;<sup>4</sup> and (4) designation of

---

<sup>1</sup> Virgin Mobile requests ETC designation throughout its entire licensed service territory. Petition at 6 and Exhibit 2.

<sup>2</sup> Id. at 2 - 13.

<sup>3</sup> Id. at 4 - 5.

<sup>4</sup> Id. at 4 and Exhibit A.

Virgin Mobile as an ETC for the designated areas served in Kentucky will serve the public interest.<sup>5</sup>

The Federal Communications Commission (“FCC”) previously designated Virgin Mobile as an ETC for the purposes of offering Lifeline services in the states of New York, North Carolina, Tennessee, and Virginia.<sup>6</sup> At that time, Virgin Mobile operated as a mobile virtual network operator (“MVNO”) and did not own any network facilities; therefore, Virgin Mobile had requested forbearance from enforcement from the Section 214(e)(1)(A) facilities-based requirement for ETC designation. The FCC conditioned the granting of the forbearance request and the ETC designation. These conditions were (a) providing Lifeline customers with 911 and enhanced 911 (“E911”) access immediately upon commencement of service and regardless of activation status or the availability of prepaid minutes; (b) offering E911-compliant handsets to new Lifeline customers upon activation of service and replacing any non-compliant handsets, at no additional charge, for existing customers who obtain Lifeline service; (c) obtaining a certification from each Public Safety Answering Point (“PSAP”) whose territory overlaps with Virgin Mobile’s Lifeline service area, confirming that the company provides its customers with 911 and E911 service or if, within 90 days of a request for certification, a PSAP has neither provided the certification nor affirmatively determined that Virgin Mobile does not provide its customers with access to 911 and E911, self-certifying that Virgin Mobile meets the 911 and E911 requirements; (d) requiring customers to self-certify under

---

<sup>5</sup> Id. at 13 -15.

<sup>6</sup> In the Matter of Virgin Mobile USA, L.P. Petition for Forbearance From 47 U.S.C. § 214(e)(1)(A); Petitions for Designation as an Eligible Telecommunications Carrier in the States of New York, North Carolina, Pennsylvania, Tennessee, and Virginia, Order, 24 FCC Rcd 3381 (rel. March 5, 2009).

penalty of perjury upon service activation and annually thereafter that they are the head of their household and receive Lifeline supported service only from Virgin Mobile; and, (e) establishing applicable safeguards to prevent its customers from activating multiple Lifeline accounts, including tracking each Lifeline customer's primary residential address.

In November 2009, Virgin Mobile was acquired by Sprint Nextel. At that time, Virgin Mobile became a facilities-based carrier because it was using the Sprint Nextel network to provide service. After the acquisition, Virgin Mobile was designated as a facilities-based ETC in the states of Florida, Indiana, Louisiana, Maryland, Michigan, Mississippi, New Jersey, Texas, Washington, and West Virginia.

Virgin Mobile has branded its prepaid Lifeline service "Assurance Wireless Brought To You By Virgin Mobile." The service will provide customers with the same features and functionalities enjoyed by all other Virgin Mobile prepaid Customers, with one notable exception: prepaid Lifeline services will be free of charge. Under the current plan, eligible customers will receive 250 anytime prepaid minutes per month at no charge with additional service priced at \$0.10/minute and \$0.10/text message. Virgin Mobile has also implemented new methods by which Lifeline customers, entirely at their option, can purchase blocks of additional service. Under the first new option, Lifeline customers can add \$5 to their account to purchase an additional 250 monthly minutes, providing them with a total of 500 voice minutes in a month (250 free minutes plus 250 additional minutes). Under the second option, Lifeline customers can add \$20 to their account to purchase an additional 750 voice minutes, providing them with a total of 1,000 voice minutes (250 free minutes plus 750 additional minutes). Customers

choosing this second option will also receive 1,000 monthly text messages. Customers are not obligated to purchase these additional offerings or add money to their accounts, and all eligible customers will continue to receive 250 free monthly minutes. Minutes and text messages do not carry forward from month-to-month. Only voice minutes and text messages purchased for \$0.10/unit will carry over from month-to-month when not used.

Lifeline customers will be able to access 911 emergency and customer care services regardless of whether they have any remaining minutes in their account. In addition, minutes used for calls placed to 911 emergency services and Virgin Mobile/Assurance Wireless customer care are not decremented from a customer's account. Lifeline customers will receive free service so long as they do not elect to exceed 250 minutes of voice service per month with no additional charges for taxes or activation.

New customers may elect to receive a free Assurance Wireless-branded handset with E911 functionality. Current Virgin Mobile customers will be able to use their existing handsets to receive prepaid Lifeline services or may elect to receive a free Assurance Wireless handset.

Virgin Mobile will implement measures to guard against potential fraudulent use of Lifeline service. Applicants for Lifeline service must provide their name, residential address, and relevant eligibility criteria. The enrollment form includes an applicant certification section where each applicant must attest and sign under penalty of perjury that the applicant receives Lifeline-supported service only from Virgin Mobile. As an additional protection against fraudulent use of the company's Lifeline services, Virgin

Mobile tracks each applicant's primary residential address and cross checks this information against internal databases to confirm that a Virgin Mobile lifeline account has not already been activated for that address or individual. If a name or address submitted by a Lifeline applicant is associated with a customer who already receives Virgin Mobile Lifeline service, or if the address provided is not a valid U.S. postal address, Virgin Mobile will review the application to ascertain whether the customer is attempting to activate multiple Virgin Mobile Lifeline accounts and, if so, deny the application.

Virgin Mobile will implement a non-usage policy in Kentucky. Under this policy, if a customer does not make a voice call or send a text message or otherwise demonstrate activity at least once during any continuous 60-day period, Virgin Mobile will promptly notify the customer that the customer is no longer eligible for Lifeline service subject to a 30-day grace period. During the 30-day grace period, the customer's account would remain active, and Virgin Mobile will engage in outreach efforts to determine whether the customer desires to remain on its Lifeline service. If the customer's account does not show any customer-specific activity during the grace period (such as making or receiving a voice call, receiving or sending a text message, downloading data, or adding money to the account), Virgin Mobile will deactivate Lifeline services for that customer. In addition, Virgin Mobile will not recover a federal USF subsidy for the free minutes provided to the customer during the grace period or thereafter report that customer on its Universal Service Administrative Company

("USAC") Form 497. Virgin Mobile has agreed that it will file this report of non-usage with the Commission.<sup>7</sup>

Virgin Mobile has stated in its responses to the Kentucky Public Service Commission's ("Commission") data requests that it does submit to the Commission the Kentucky USF fee and Kentucky Telecommunications Relay Service and Telecommunications Access Program fee for each customer although not billed directly to the customer because the customers do not receive bills.<sup>8</sup> Virgin Mobile also states that it does remit the statewide wireless 911 fee as prescribed in KRS 65.7635(1).<sup>9</sup>

Virgin Mobile, also in response to the Commission's data requests, states that it will not be seeking funding from the Kentucky USF, nor will it be seeking reimbursement from the Federal USF for toll limitation service or Link-Up.<sup>10</sup>

On April 5, 2011, the Commission issued information requests to Virgin Mobile. Virgin Mobile filed its responses on May 2, 2011. The Commission finds that this matter is now ripe for a decision.

## DISCUSSION

Pursuant to 47 U.S.C. § 254(e), "only an eligible telecommunications carrier designated under 47 U.S.C. § 214(e) shall be eligible to receive specific federal universal service support." Pursuant to 47 U.S.C. § 214(e)(1), a common carrier

---

<sup>7</sup> Virgin Mobile's response to Commission Staff's First Data Request No. 25.

<sup>8</sup> Id. at Request Nos. 5 and 6.

<sup>9</sup> Id. at Request No. 7.

<sup>10</sup> Id. at Request Nos. 12, 13, and 15.

designated as an ETC must offer and advertise the services supported by the federal universal service mechanisms throughout the designated service area.

Pursuant to 47 U.S.C. § 214(e)(2), state commissions bear the primary responsibility for performing ETC designations. Under the same section, the Commission may, with respect to an area served by a rural telephone company, and shall, in all other cases, designate more than one common carrier as an ETC for a designated service area, consistent with the public interest, convenience, and necessity, as long as the requesting carrier meets the requirements of 47 U.S.C. § 214(e)(1). Also, before designating an additional ETC for an area served by a rural telephone company, the Commission must determine that the designation is in the public interest.

As outlined in 47 C.F.R. § 54.201(d), an ETC petition must contain the following: (1) a certification that the petitioner offers or intends to offer all services designated for support by the Commission pursuant to 47 U.S.C. § 254(c); (2) a certification that the petitioner offers or intends to offer the supported services “either using its own facilities or a combination of its own facilities and resale of another carrier’s services”; (3) a description of how the petitioner “advertise[s] the availability of [supported] services and the charges therefore [sic] using media of general distribution”; and (4) if the petitioner meets the definition of a “rural telephone company” pursuant to 47 U.S.C. § 153(37), the petitioner must identify its study area; or, if the petitioner is not a rural telephone company, it must include a detailed description of the geographic service area for which it requests an ETC designation from the Commission.

### OFFERING THE SERVICES DESIGNATED FOR SUPPORT

Virgin Mobile has demonstrated through the required certifications and related filings that it now offers, or will offer upon designation as an ETC, the services supported by the federal universal service mechanism. Virgin Mobile certifies that it now provides or will provide throughout its designated service area the services and functionalities enumerated in 47 C.F.R. § 54.101(a). Virgin Mobile has also certified that, in compliance with 47 C.F.R § 54.405, it will make available and advertise Lifeline service to qualifying low-income consumers.

### OFFERING THE SUPPORTED SERVICES USING A CARRIER'S OWN FACILITIES

Prior to November 2009, Virgin Mobile was a non-facilities based MVNO. Subsequent to that date, Virgin Mobile was acquired by Sprint Nextel Corporation ("Sprint"). The FCC has found that Virgin Mobile, as a wholly owned affiliate of Sprint, now "owns" Sprint's facilities for the purposes of the facilities requirement in Section 214(e) of the Act.<sup>11</sup> Therefore the Commission agrees that Virgin Mobile is a facilities-based wireless telecommunications carrier which owns its switching, transport, cell sites, and associated telecommunications facilities in its proposed designated ETC service area.

Virgin Mobile states that it intends to provide the supported services using its existing network infrastructure. As discussed previously in this Order, 47 C.F.R. § 54.201(d) defines the requirements that a carrier must fulfill in order to be granted ETC

---

<sup>11</sup> In the Matter of Virgin Mobile USA, L.P. Petitions for Designation as an Eligible Telecommunications Carrier in the States of Alabama, Connecticut, Delaware, New Hampshire, and Washington D.C, Order, DA 10-2433. See at para. 15 (rel. Dec. 29, 2010).

status. Under section (d), the carrier must provide the supported services by “either using its own facilities or a combination of its own facilities and resale of another carrier’s services (including the services offered by another eligible telecommunications carrier).” The next section, 47 C.F.R. § 54.201(e), defines the term “facilities” to mean “any physical components of the telecommunications network that are used in the transmission or routing of the service that are designated for support pursuant to subpart B of this part.” 47 C.F.R. § 54.201(f) provides that “the term ‘own facilities’ includes, but is not limited to, facilities obtained as unbundled network elements pursuant to part 51 of this chapter, provided that such facilities meet the definition of the term ‘facilities’ under this subpart.”<sup>12</sup> The Commission finds that Virgin Mobile has demonstrated that it satisfies the requirement of 47 U.S.C. § 214(e)(1)(A) that it offers the supported services using either its own facilities or a combination of its own facilities and resale of another carrier’s services.

#### ADVERTISING SUPPORTED SERVICES

Virgin Mobile has demonstrated that it satisfies the requirement of 47 U.S.C. § 214(e)(1)(b) to advertise the availability of the supported services and the charges therefor using media of general distribution. In its petition, Virgin Mobile states that it will publicize the availability of Lifeline and Link-Up in a manner reasonably designed to reach those likely to qualify for those services, as required by 47 C.F.R. §§ 54.405(b) and 54.411(d). Virgin Mobile shall also advertise each of the supported services on a regular basis in newspapers, magazines, television, and radio, in accordance with 47 C.F.R. § 54.201(d)(2).

---

<sup>12</sup> See, e.g., 47 C.F.R. §§ 51.307–51.318, which outline the requirements for carrier access to and use of unbundled network elements.

## RURAL AND NON-RURAL STUDY AREAS

The FCC has previously found designation of additional ETCs in areas served by non-rural telephone companies to be in the public interest based upon a demonstration that the requesting carrier complies with the statutory eligibility obligations of 47 U.S.C. § 214(e)(1).<sup>13</sup>

### Rural Study Areas

In considering whether designation of Virgin Mobile as an ETC in areas served by rural telephone companies will serve the public interest, the Commission must consider whether the benefits of an additional ETC in such study areas outweigh any potential harm. In determining whether designation of a competitive ETC in a rural telephone company's service area is in the public interest, the Commission must weigh the benefits of increased competitive choice, the impact of the designation on the universal service fund, the unique advantages and disadvantages of the competitor's service offering, any commitments made regarding quality of telephone service, and the competitive ETC's ability to satisfy its obligation to serve the designated service areas within a reasonable time frame.

The Commission finds that Virgin Mobile's universal service offering will provide a variety of benefits to customers. For instance, Virgin Mobile has committed to provide customers access to telecommunications and data services when they do not have access to a wireline telephone. In addition, the mobility of Virgin Mobile's wireless service will provide benefits such as access to emergency services that can mitigate the

---

<sup>13</sup> See, e.g., Cellco Partnership d/b/a Bell Atlantic Mobile Petition for Designation as an Eligible Telecommunications Carrier, Memorandum Opinion and Order, CC Docket No. 96-45, 16 FCC Rcd 39 (2000).

unique risks of geographic isolation associated with living in rural communities. Moreover, Virgin Mobile states that it offers larger local calling areas than those of the Incumbent Local Exchange Carriers it competes against, which could result in fewer toll charges for Virgin Mobile's customers.

#### Public Interest Analysis

In determining whether the public interest is served, the burden of proof is upon the ETC applicant.<sup>14</sup> Virgin Mobile asserts that granting ETC designation to Virgin Mobile will provide consumers the benefits of value for their money, access to emergency services on wireless devices, and reliable means of contact for prospective employers, social service agencies, or dependents. Virgin Mobile also asserts that providing Lifeline service to those most in danger of losing wireless service promotes the public interest. Virgin Mobile has satisfied the burden of proof in establishing that its universal service offering in this area will provide benefits to rural consumers.

#### Designated Service Areas

The Commission finds that Virgin Mobile should be certified as an ETC in the requested service areas served by rural and non-rural telephone companies, as listed in the Appendix to this Order. For purposes of federal universal service obligations, a rural telephone company's study area is presumed to be its service area unless and until the FCC and state commission cooperatively establish a different service area definition for such company after considering the Federal-State Joint Board on Universal Service's

---

<sup>14</sup> See Highland Cellular Order 19 FCC Rcd at 6431, para. 20; Virginia Cellular Order, 19 FCC Rcd at 1574-75, para. 26.

("Joint Board") service area recommendations.<sup>15</sup> Therefore, if a state commission proposes to define a rural telephone company study area as something less than the company's entire service area, the state commission must consider and make findings with respect to each of the three Joint Board factors.

However, because Virgin Mobile is only requesting low income support, the Commission finds that the study areas of the affected rural telephone companies do not have to be redefined to match the licensed service area of the applicant.

#### ANNUAL CERTIFICATION AND VERIFICATION

Each year, Virgin Mobile will require each Lifeline subscriber to recertify their head of household status, certify that only one Lifeline discount is received at that household, and document their continued program eligibility for Lifeline in accordance with the annual Lifeline Certification and Verification for USAC that is due annually at the end of August and in accordance with Administrative Case No. 360.<sup>16</sup> The Commission finds that Virgin Mobile's plan to meet the annual certification and verification requirements is in accordance with the Commission's requirements.

The Commission, having reviewed the evidence of record and having been otherwise sufficiently advised, HEREBY ORDERS that:

1. Virgin Mobile is designated as an ETC for the exchanges of the non-rural and rural telephone companies identified in the Appendix to this Order.

---

<sup>15</sup> 47 U.S.C. § 214(e)(5); 47 C.F.R. § 54.207(b).

<sup>16</sup> Administrative Case No. 360, An Inquiry Into Universal Service and Funding Issues (Ky. PSC May 24, 2007).

2. During the current certification period, Virgin Mobile shall be eligible to receive federal Universal Service Fund support.

3. Virgin Mobile shall offer low-income universal support services to consumers in its service area.

4. Virgin Mobile shall offer these services using its own facilities or a combination of its own facilities and resale of another carrier's services, including the services offered by another ETC.

5. Pursuant to 47 C.F.R. § 54.201(i), Virgin Mobile shall be precluded from offering universal service support exclusively through the resale of another carrier's services.

6. Virgin Mobile shall advertise the availability of and charges for these services using media of general distribution.

7. Virgin Mobile shall comply with the Commission's annual certification process for Lifeline customers in accordance with the requirements of Administrative Case No. 360.<sup>17</sup>

8. A copy of this Order shall be served upon the FCC and the USAC.

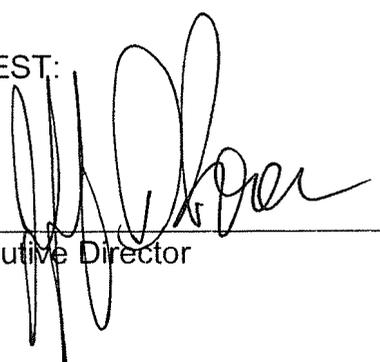
---

<sup>17</sup> Id.

By the Commission

ENTERED  
JUN 10 2011  
KENTUCKY PUBLIC  
SERVICE COMMISSION

ATTEST:

  
\_\_\_\_\_  
Executive Director

Case No. 2010-00524

APPENDIX

APPENDIX TO AN ORDER OF THE KENTUCKY PUBLIC SERVICE  
COMMISSION IN CASE NO. 2010-00524 DATED **JUN 10 2011**

Designated Areas for which Virgin Mobile is Granted ETC Designation

<u>CLLI</u>	<u>EXCHANGE</u>	<u>SAC</u>	<u>COMPANY</u>
BNDNKYXA	Bandana	260396	Ballard Rural Telephone Coop. Corp., Inc.
BRLWKYXA	Barlow	260396	Ballard Rural Telephone Coop. Corp., Inc.
HETHKYXA	Heath	260396	Ballard Rural Telephone Coop. Corp., Inc.
KEVLKYXA	Kevil	260396	Ballard Rural Telephone Coop. Corp., Inc.
LACTKYXA	La Center	260396	Ballard Rural Telephone Coop. Corp., Inc.
WCKLKYXA	Wickliffe	260396	Ballard Rural Telephone Coop. Corp., Inc.
ALLNKYMA	Allen	265182	BellSouth Telecom Inc. dba AT&T Kentucky
BGDDKYMA	Bagdad	265182	BellSouth Telecom Inc. dba AT&T Kentucky
BRTWKYES	Bardstown	265182	BellSouth Telecom Inc. dba AT&T Kentucky
BVDMKYMA	Beaver Dam	265182	BellSouth Telecom Inc. dba AT&T Kentucky
BDFRKYMA	Bedford	265182	BellSouth Telecom Inc. dba AT&T Kentucky
BNTNKYMA	Benton	265182	BellSouth Telecom Inc. dba AT&T Kentucky
BLFDKYMA	Bloomfield	265182	BellSouth Telecom Inc. dba AT&T Kentucky
BLSPKYMA	Bluff Springs	265182	BellSouth Telecom Inc. dba AT&T Kentucky
BWLGKYRV	Bowling Green	265182	BellSouth Telecom Inc. dba AT&T Kentucky
BRMNKYMA	Bremen	265182	BellSouth Telecom Inc. dba AT&T Kentucky
BRGNKYMA	Burgin	265182	BellSouth Telecom Inc. dba AT&T Kentucky
CADZKYMA	Cadiz	265182	BellSouth Telecom Inc. dba AT&T Kentucky
CLHNKYMA	Calhoun	265182	BellSouth Telecom Inc. dba AT&T Kentucky
CMBGKYMA	Campbellsburg	265182	BellSouth Telecom Inc. dba AT&T Kentucky
CNTNKYMA	Canton	265182	BellSouth Telecom Inc. dba AT&T Kentucky
CRLSKYMA	Carlisle	265182	BellSouth Telecom Inc. dba AT&T Kentucky
CRTNKYMA	Carrollton	265182	BellSouth Telecom Inc. dba AT&T Kentucky
CNTWKYMA	Centertown	265182	BellSouth Telecom Inc. dba AT&T Kentucky
CNCYKYMA	Central City	265182	BellSouth Telecom Inc. dba AT&T Kentucky
CHPLKYMA	Chaplin	265182	BellSouth Telecom Inc. dba AT&T Kentucky
CYDNKYMA	Corydon	265182	BellSouth Telecom Inc. dba AT&T Kentucky
CRBOKYMA	Crab Orchard	265182	BellSouth Telecom Inc. dba AT&T Kentucky
COTNKYMA	Crofton	265182	BellSouth Telecom Inc. dba AT&T Kentucky
CYNTKYMA	Cynthiana	265182	BellSouth Telecom Inc. dba AT&T Kentucky
DWSPKYES	Dawson Springs	265182	BellSouth Telecom Inc. dba AT&T Kentucky
DRBOKYES	Drakesboro	265182	BellSouth Telecom Inc. dba AT&T Kentucky
ERTNKYMA	Earlington	265182	BellSouth Telecom Inc. dba AT&T Kentucky
EDVLKYMA	Eddyville	265182	BellSouth Telecom Inc. dba AT&T Kentucky
EKTNKYMA	Elkton	265182	BellSouth Telecom Inc. dba AT&T Kentucky
EMNKNYES	Eminence	265182	BellSouth Telecom Inc. dba AT&T Kentucky
EMNKNYPL	Eminence	265182	BellSouth Telecom Inc. dba AT&T Kentucky
ENSRKYMA	Ensor	265182	BellSouth Telecom Inc. dba AT&T Kentucky
FNVLYKYMA	Finchville	265182	BellSouth Telecom Inc. dba AT&T Kentucky
FORDKYMA	Ford	265182	BellSouth Telecom Inc. dba AT&T Kentucky

<u>CLLI</u>	<u>EXCHANGE</u>	<u>SAC</u>	<u>COMPANY</u>
FRFTKYES	Frankfort	265182	BellSouth Telecom Inc. dba AT&T Kentucky
FRFTKYMA	Frankfort	265182	BellSouth Telecom Inc. dba AT&T Kentucky
FKLNKYMA	Franklin	265182	BellSouth Telecom Inc. dba AT&T Kentucky
FRDNKYMA	Fredonia	265182	BellSouth Telecom Inc. dba AT&T Kentucky
FLTNKYMA	Fulton	265182	BellSouth Telecom Inc. dba AT&T Kentucky
GRTWKYMA	Georgetown	265182	BellSouth Telecom Inc. dba AT&T Kentucky
GHNTKYMA	Ghent	265182	BellSouth Telecom Inc. dba AT&T Kentucky
GBVLKYMA	Gilbertsville	265182	BellSouth Telecom Inc. dba AT&T Kentucky
GRACKYMA	Gracey	265182	BellSouth Telecom Inc. dba AT&T Kentucky
GNVLKYMA	Greenville	265182	BellSouth Telecom Inc. dba AT&T Kentucky
HABTKYMA	Habit	265182	BellSouth Telecom Inc. dba AT&T Kentucky
HANSKYMA	Hanson	265182	BellSouth Telecom Inc. dba AT&T Kentucky
HDBGKYMA	Harrodsburg	265182	BellSouth Telecom Inc. dba AT&T Kentucky
HRFRKYMA	Hartford	265182	BellSouth Telecom Inc. dba AT&T Kentucky
HWVLKYMA	Hawesville	265182	BellSouth Telecom Inc. dba AT&T Kentucky
HBVLKYMA	Hebbardsville	265182	BellSouth Telecom Inc. dba AT&T Kentucky
HNSNKYMA	Henderson	265182	BellSouth Telecom Inc. dba AT&T Kentucky
HCMNKYMA	Hickman	265182	BellSouth Telecom Inc. dba AT&T Kentucky
ISLDKYMA	Island	265182	BellSouth Telecom Inc. dba AT&T Kentucky
JNCYKYMA	Junction City	265182	BellSouth Telecom Inc. dba AT&T Kentucky
KKVLKYMA	Kirksville	265182	BellSouth Telecom Inc. dba AT&T Kentucky
LFYTKYMA	Lafayette	265182	BellSouth Telecom Inc. dba AT&T Kentucky
LGRNKYES	Lagrange	265182	BellSouth Telecom Inc. dba AT&T Kentucky
LRBGKYMA	Lawrenceburg	265182	BellSouth Telecom Inc. dba AT&T Kentucky
LBJTKYMA	Lebanon Junction	265182	BellSouth Telecom Inc. dba AT&T Kentucky
PARSKYMA	Little Rock	265182	BellSouth Telecom Inc. dba AT&T Kentucky
LVMRKYMA	Livermore	265182	BellSouth Telecom Inc. dba AT&T Kentucky
LOUSKYES	Louisa	265182	BellSouth Telecom Inc. dba AT&T Kentucky
LSVLKY26	Louisville	265182	BellSouth Telecom Inc. dba AT&T Kentucky
LSVLKYAN	Louisville	265182	BellSouth Telecom Inc. dba AT&T Kentucky
LSVLKYBE	Louisville	265182	BellSouth Telecom Inc. dba AT&T Kentucky
LSVLKYBR	Louisville	265182	BellSouth Telecom Inc. dba AT&T Kentucky
LSVLKYCW	Louisville	265182	BellSouth Telecom Inc. dba AT&T Kentucky
LSVLKYFC	Louisville	265182	BellSouth Telecom Inc. dba AT&T Kentucky
LSVLKYHA	Louisville	265182	BellSouth Telecom Inc. dba AT&T Kentucky
LSVLKYJT	Louisville	265182	BellSouth Telecom Inc. dba AT&T Kentucky
LSVLKYO	Louisville	265182	BellSouth Telecom Inc. dba AT&T Kentucky
LSVLKYSH	Louisville	265182	BellSouth Telecom Inc. dba AT&T Kentucky
LSVLKYSL	Louisville	265182	BellSouth Telecom Inc. dba AT&T Kentucky
LSVLKYSM	Louisville	265182	BellSouth Telecom Inc. dba AT&T Kentucky
LSVLKYTS	Louisville	265182	BellSouth Telecom Inc. dba AT&T Kentucky
LSVLKYVS	Louisville	265182	BellSouth Telecom Inc. dba AT&T Kentucky
MACEKYMA	Maceo	265182	BellSouth Telecom Inc. dba AT&T Kentucky
MARTKYMA	Martin	265182	BellSouth Telecom Inc. dba AT&T Kentucky
MDBOKYMA	Middlesboro	265182	BellSouth Telecom Inc. dba AT&T Kentucky
MLBGKYMA	Millersburg	265182	BellSouth Telecom Inc. dba AT&T Kentucky
MLTNKYMA	Milton	265182	BellSouth Telecom Inc. dba AT&T Kentucky

<u>CLLI</u>	<u>EXCHANGE</u>	<u>SAC</u>	<u>COMPANY</u>
SPFDKYMA	MOORESVILLE	265182	BellSouth Telecom Inc. dba AT&T Kentucky
MGTWKYMA	MORGANTOWN	265182	BellSouth Telecom Inc. dba AT&T Kentucky
MRGPKYMA	Mortons Gap	265182	BellSouth Telecom Inc. dba AT&T Kentucky
MTEDKYMA	Mt Eden	265182	BellSouth Telecom Inc. dba AT&T Kentucky
MTSTKYMA	Mt Sterling	265182	BellSouth Telecom Inc. dba AT&T Kentucky
MRRYKYMA	Murray	265182	BellSouth Telecom Inc. dba AT&T Kentucky
NWHNKYMA	New Haven	265182	BellSouth Telecom Inc. dba AT&T Kentucky
NRVLKYMA	Nortonville	265182	BellSouth Telecom Inc. dba AT&T Kentucky
OKGVKYES	Oak Grove	265182	BellSouth Telecom Inc. dba AT&T Kentucky
OWTNKYMA	Owenton	265182	BellSouth Telecom Inc. dba AT&T Kentucky
PDCHKYIP	Paducah	265182	BellSouth Telecom Inc. dba AT&T Kentucky
PDCHKYLO	Paducah	265182	BellSouth Telecom Inc. dba AT&T Kentucky
PDCHKYRL	Paducah	265182	BellSouth Telecom Inc. dba AT&T Kentucky
PNVLKYMA	Paintsville	265182	BellSouth Telecom Inc. dba AT&T Kentucky
PNTHKYMA	Panther	265182	BellSouth Telecom Inc. dba AT&T Kentucky
PMBRKYMA	Pembroke	265182	BellSouth Telecom Inc. dba AT&T Kentucky
PRVLKYMA	Perryville	265182	BellSouth Telecom Inc. dba AT&T Kentucky
PKVLKYMA	Pikeville	265182	BellSouth Telecom Inc. dba AT&T Kentucky
PIVLKYMA	Pineville	265182	BellSouth Telecom Inc. dba AT&T Kentucky
PLRGKYMA	Pleasant Ridge	265182	BellSouth Telecom Inc. dba AT&T Kentucky
PTRYKYMA	Port Royal	265182	BellSouth Telecom Inc. dba AT&T Kentucky
PRBGKYES	Prestonsburg	265182	BellSouth Telecom Inc. dba AT&T Kentucky
PRTNKYES	Princeton	265182	BellSouth Telecom Inc. dba AT&T Kentucky
RCMDKYMA	Richmond	265182	BellSouth Telecom Inc. dba AT&T Kentucky
RBRDKYMA	Robards	265182	BellSouth Telecom Inc. dba AT&T Kentucky
RSTRKYES	Rose Terrace	265182	BellSouth Telecom Inc. dba AT&T Kentucky
RLVLKYMA	Russellville	265182	BellSouth Telecom Inc. dba AT&T Kentucky
SCRMKYMA	Sacramento	265182	BellSouth Telecom Inc. dba AT&T Kentucky
SDVLKYMA	Sadieville	265182	BellSouth Telecom Inc. dba AT&T Kentucky
SLVSKYMA	Salvisa	265182	BellSouth Telecom Inc. dba AT&T Kentucky
SEBRKYMA	Sebree	265182	BellSouth Telecom Inc. dba AT&T Kentucky
SHGVKYMA	Sharon Grove	265182	BellSouth Telecom Inc. dba AT&T Kentucky
SHVLKYMA	Shelbyville	265182	BellSouth Telecom Inc. dba AT&T Kentucky
SSVLKYMA	Simpsonville	265182	BellSouth Telecom Inc. dba AT&T Kentucky
SLGHKYMA	Slaughters	265182	BellSouth Telecom Inc. dba AT&T Kentucky
SRGHKYMA	Sorgho	265182	BellSouth Telecom Inc. dba AT&T Kentucky
GTHRKYMA	South Guthrietrn	265182	BellSouth Telecom Inc. dba AT&T Kentucky
STCHKYMA	St Charles	265182	BellSouth Telecom Inc. dba AT&T Kentucky
STGRKYMA	Stamping Ground	265182	BellSouth Telecom Inc. dba AT&T Kentucky
STFRKYMA	Stanford	265182	BellSouth Telecom Inc. dba AT&T Kentucky
STNLKYMA	Stanley	265182	BellSouth Telecom Inc. dba AT&T Kentucky
SNTNKYMA	Stanton	265182	BellSouth Telecom Inc. dba AT&T Kentucky
SLPHKYMA	Sulphur	265182	BellSouth Telecom Inc. dba AT&T Kentucky
TYVLKYMA	Taylorville	265182	BellSouth Telecom Inc. dba AT&T Kentucky
TRE NKYMA	Trenton	265182	BellSouth Telecom Inc. dba AT&T Kentucky
UTICKYMA	Utica	265182	BellSouth Telecom Inc. dba AT&T Kentucky
VIRGKYMA	Virgie	265182	BellSouth Telecom Inc. dba AT&T Kentucky

<u>CLLI</u>	<u>EXCHANGE</u>	<u>SAC</u>	<u>COMPANY</u>
WACOKYMA	Waco	265182	BellSouth Telecom Inc. dba AT&T Kentucky
WDDYKYMA	Waddy	265182	BellSouth Telecom Inc. dba AT&T Kentucky
WLVLKYMA	West Louisville	265182	BellSouth Telecom Inc. dba AT&T Kentucky
WSPNKYMA	West Point	265182	BellSouth Telecom Inc. dba AT&T Kentucky
WHVLKYMA	Whitesville	265182	BellSouth Telecom Inc. dba AT&T Kentucky
WLBGKYMA	Williamsburg	265182	BellSouth Telecom Inc. dba AT&T Kentucky
WSBGKYMA	Willisburg	265182	BellSouth Telecom Inc. dba AT&T Kentucky
WNCHKYPV	Winchester	265182	BellSouth Telecom Inc. dba AT&T Kentucky
BRBGKYXA	Brandenburg	260398	Brandenburg Telephone Co.
NGRTKYXA	North Garrett	260398	Brandenburg Telephone Co.
RDCLKYXA	Radcliff	260398	Brandenburg Telephone Co.
VNGVKYXA	Vine Grove	260398	Brandenburg Telephone Co.
ALXNKYAL	Alexandria2	265061	Cincinnati Bell, Inc.
BURLKYBN	Boone1	265061	Cincinnati Bell, Inc.
UNINKYAC	Boone1	265061	Cincinnati Bell, Inc.
FLRNKYFL	Boone2	265061	Cincinnati Bell, Inc.
BTLRKYBR	Butler	265061	Cincinnati Bell, Inc.
CVTNKYCN	Covington	265061	Cincinnati Bell, Inc.
FTTHKYFT	Covington	265061	Cincinnati Bell, Inc.
LKPKKYL	Covington	265061	Cincinnati Bell, Inc.
FLMOKYUA	Falmouth	265061	Cincinnati Bell, Inc.
GLCOKYGC	Glencoe	265061	Cincinnati Bell, Inc.
INDPKYIN	Independence1	265061	Cincinnati Bell, Inc.
WLTKYWL	Walton1	265061	Cincinnati Bell, Inc.
WRSWKYWR	Warsaw	265061	Cincinnati Bell, Inc.
CRTDKYCT	Williamstown	265061	Cincinnati Bell, Inc.
WLTWKYWT	Williamstown	265061	Cincinnati Bell, Inc.
FRPLKYXA	Fairplay	260401	Duo County Telephone Cooperative, Inc.
JMTWKYXA	Jamestown	260401	Duo County Telephone Cooperative, Inc.
CPMNKYXA	Chapman	260406	Foothills Rural Telephone Cooperative Co.
FLBGKYXA	Fallsburg	260406	Foothills Rural Telephone Cooperative Co.
SFVLKY01	Stafordsvl	260406	Foothills Rural Telephone Cooperative Co.
GRTHKYXE	Grethel	260408	Gearheart Comm. Co., Inc. dba Coalfields
HRLDKYXE	Jenkins	260408	Gearheart Comm. Co., Inc. dba Coalfields
LWPTKYXA	Lewisport	260412	Lewisport Telephone Co., Inc.
AIVLKYXE	Adairville	260413	Logan Telephone Cooperative, Inc.
AUBNKYXA	Auburn	260413	Logan Telephone Cooperative, Inc.
DNMRKYXA	Dunmor	260413	Logan Telephone Cooperative, Inc.
LGPTKYXA	Logansport	260413	Logan Telephone Cooperative, Inc.
LWBGKYXL	Lewisbrg	260413	Logan Telephone Cooperative, Inc.
ROCHKYXA	Rochester	260413	Logan Telephone Cooperative, Inc.
SCVLKYXR	Scottsville2	290573	North Central Telephone Cooperative, Inc.
BFLOKYXA	Buffalo	260418	South Central Rural Telephone Coop. Corp.
CNMRKYXA	Canmer	260418	South Central Rural Telephone Coop. Corp.
CVCYKYXA	Cave City	260418	South Central Rural Telephone Coop. Corp.
CNTRKYXA	Center	260418	South Central Rural Telephone Coop. Corp.
GLSGKYXR	Glasgow2	260418	South Central Rural Telephone Coop. Corp.

<u>CLLI</u>	<u>EXCHANGE</u>	<u>SAC</u>	<u>COMPANY</u>
HSVLKYXA	Hiseville	260418	South Central Rural Telephone Coop. Corp.
HRCVKYXA	Horse Cave	260418	South Central Rural Telephone Coop. Corp.
LUCSKYXA	Lucas	260418	South Central Rural Telephone Coop. Corp.
MGNLKYXA	Magnolia	260418	South Central Rural Telephone Coop. Corp.
MFVLKYXA	Munfordvl	260418	South Central Rural Telephone Coop. Corp.
TMHLKYXA	Templehill	260418	South Central Rural Telephone Coop. Corp.
FRNGKYXA	Fairdealing	260421	West Kentucky Rural Telephone Coop. Corp.
HRDNKYXA	Hardin	260421	West Kentucky Rural Telephone Coop. Corp.
KRKSKYXA	Kirksey	260421	West Kentucky Rural Telephone Coop. Corp.
LYGVKYXA	Lynn Grove	260421	West Kentucky Rural Telephone Coop. Corp.
NWCNKYXA	New Concord	260421	West Kentucky Rural Telephone Coop. Corp.
HAZLKYXA	Southhazel	260421	West Kentucky Rural Telephone Coop. Corp.
ASLDKYXA	Ashland	269690	Windstream Kentucky East, Inc. – Lexington
BEREKYXA	Berea	269690	Windstream Kentucky East, Inc. – Lexington
BTVLKYXA	Bryantsville	269690	Windstream Kentucky East, Inc. – Lexington
BRSDKYXA	Burnside	269690	Windstream Kentucky East, Inc. – Lexington
CMVLKYXA	Campbellsville	269690	Windstream Kentucky East, Inc. – Lexington
CTBGKYXA	Catlettsburg	269690	Windstream Kentucky East, Inc. – Lexington
CECLKYXA	Cecilia	269690	Windstream Kentucky East, Inc. – Lexington
CLMAKYXA	Columbia	269690	Windstream Kentucky East, Inc. – Lexington
EZTWKYXA	Elizabethtown	269690	Windstream Kentucky East, Inc. – Lexington
GRSNKYXA	Garrison	269690	Windstream Kentucky East, Inc. – Lexington
GLSGKYXA	Glasgow1	269690	Windstream Kentucky East, Inc. – Lexington
GYSNKYXA	Grayson	269690	Windstream Kentucky East, Inc. – Lexington
GNBGKYXB	Greensburg	269690	Windstream Kentucky East, Inc. – Lexington
GNUMKYXA	Greenup	269690	Windstream Kentucky East, Inc. – Lexington
HLBOKYXA	Hillsboro	269690	Windstream Kentucky East, Inc. – Lexington
HGVLKYXA	Hodgenville	269690	Windstream Kentucky East, Inc. – Lexington
HTVLKYXE	Hustonville	269690	Windstream Kentucky East, Inc. – Lexington
LNCSKYXA	Lancaster	269690	Windstream Kentucky East, Inc. – Lexington
LBNNKYXA	Lebanon	269690	Windstream Kentucky East, Inc. – Lexington
LXTNKYUK	Lexington	269690	Windstream Kentucky East, Inc. – Lexington
LXTNKYXB	Lexington	269690	Windstream Kentucky East, Inc. – Lexington
LXTNKYXC	Lexington	269690	Windstream Kentucky East, Inc. – Lexington
LXTNKYXD	Lexington	269690	Windstream Kentucky East, Inc. – Lexington
LXTNKYXE	Lexington	269690	Windstream Kentucky East, Inc. – Lexington
LXTNKYXF	Lexington	269690	Windstream Kentucky East, Inc. – Lexington
LXTNKYXG	Lexington	269690	Windstream Kentucky East, Inc. – Lexington
LBRTKYXA	Liberty	269690	Windstream Kentucky East, Inc. – Lexington
LRTTKYXA	Loretto	269690	Windstream Kentucky East, Inc. – Lexington
MEDSKYXA	Meads	269690	Windstream Kentucky East, Inc. – Lexington
MDWYKYXA	Midway	269690	Windstream Kentucky East, Inc. – Lexington
MNTIKYXA	Monticello	269690	Windstream Kentucky East, Inc. – Lexington
NANCKYXA	Nancy	269690	Windstream Kentucky East, Inc. – Lexington
NCVLKYXA	Nicholasville	269690	Windstream Kentucky East, Inc. – Lexington
OLHLKYXA	Olive Hill	269690	Windstream Kentucky East, Inc. – Lexington
OWVLKYXA	Owingsville	269690	Windstream Kentucky East, Inc. – Lexington

<u>CLLI</u>	<u>EXCHANGE</u>	<u>SAC</u>	<u>COMPANY</u>
PNLCKYXE	Paint Lick	269690	Windstream Kentucky East, Inc. – Lexington
RSSLKYXB	Russell	269690	Windstream Kentucky East, Inc. – Lexington
SLLCKYXA	Salt Lick	269690	Windstream Kentucky East, Inc. – Lexington
SCVLKYXA	Scottsville1	269690	Windstream Kentucky East, Inc. – Lexington
SHBGKYXA	Sharpsburg	269690	Windstream Kentucky East, Inc. – Lexington
SHDNKYXA	South Hardin	269690	Windstream Kentucky East, Inc. – Lexington
SSHRKYXA	South Shore	269690	Windstream Kentucky East, Inc. – Lexington
VRSLKYXA	Versailles	269690	Windstream Kentucky East, Inc. – Lexington
WLMRKYXA	Wilmore	269690	Windstream Kentucky East, Inc. – Lexington
BBVLKYXA	Barbourville	269691	Windstream Kentucky East, Inc. – London
BRWLKYXA	Bardwell	269691	Windstream Kentucky East, Inc. – London
BRHDKYXA	Brodhead	269691	Windstream Kentucky East, Inc. – London
BWVLKYXA	Brownsville	269691	Windstream Kentucky East, Inc. – London
CLCTKYXA	Calvert City	269691	Windstream Kentucky East, Inc. – London
CLMBKYXA	Columbus	269691	Windstream Kentucky East, Inc. – London
EBRNKYAC	East Bernstadt	269691	Windstream Kentucky East, Inc. – London
EBNKKYXA	Eubank	269691	Windstream Kentucky East, Inc. – London
FBSHKYXA	Faubush	269691	Windstream Kentucky East, Inc. – London
FLLCKYXA	Flat Lick	269691	Windstream Kentucky East, Inc. – London
JHVLKYXA	Johnsville	269691	Windstream Kentucky East, Inc. – London
LVTNKYXA	Livingston	269691	Windstream Kentucky East, Inc. – London
MMCVKYXA	Mammoth Cave	269691	Windstream Kentucky East, Inc. – London
MTVRKYAI	Mount Vernon	269691	Windstream Kentucky East, Inc. – London
PRCYKYXA	Park City	269691	Windstream Kentucky East, Inc. – London
SCHLKYXA	Science Hill	269691	Windstream Kentucky East, Inc. – London
SOVLKYXA	Shopville	269691	Windstream Kentucky East, Inc. – London
SMLDKYXA	Smithland	269691	Windstream Kentucky East, Inc. – London
SMGVKYXA	Smiths Grove	269691	Windstream Kentucky East, Inc. – London
UNTWKYXA	Uniontown	269691	Windstream Kentucky East, Inc. – London
WHLLKYXA	White Lily	269691	Windstream Kentucky East, Inc. – London
MTWSKYXA	Mt Washington	260402	Windstream Kentucky West, Inc.
SHPVKYXA	Sheperdsville	260402	Windstream Kentucky West, Inc.
ZNTNKYXA	Zoneton	260402	Windstream Kentucky West, Inc.

Elaine Divelbliss  
Virgin Mobile USA, LLC  
10 Independence Blvd  
Warren, NEW JERSEY 07059

Timothy J Eifler  
Stoll Keenon Ogden, PLLC  
2000 PNC Plaza  
500 W Jefferson Street  
Louisville, KENTUCKY 40202-2828